

## **REMARKS**

Claims 1 and 3-5 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Ueda et al. (U.S. 5,838,412) and further in view of Casson et al. (U.S. 5,502,889). Applicants respectfully traverse this rejection because neither of the cited references, whether taken alone or in combination, discloses or suggests a liquid crystal display unit having the first and third boards of the present invention, where the first and third boards are formed of a same material and process, and then divided, as in claim 1 of the present invention, as previously amended.

The Examiner correctly acknowledges on page 3 of Paper No. 10 that Ueda fails to teach or suggest that the third board is formed of a same material and process as the first board, and then divided from the first board. The Examiner relies only upon Casson for disclosing or suggesting such features as in the present invention. Casson, however, fails to actually teach or suggest such features.

Specifically, the Examiner asserts that Casson teaches such features at col. 5, lines 20-30, col. 8, lines 32-40, and Fig. 1c. None of these three cited portions of Casson though, teach or suggest what the Examiner asserts. All three fail to describe any actual formation, and division, of two boards. The cited text from col. 5 of Casson merely describes how three circuit boards *that are already formed* are stacked together with epoxy and metal particles to coat the preformed boards. Applicants respectfully point out that the common coating materials cited by the Examiner in Casson are only used to connect the boards

together, and have nothing to do with the actual formation of the original boards themselves.

Accordingly, this portion of cited text has no relevance to the present invention.

A similar deficiency exists with the portion of text cited by the Examiner in col. 8 of Casson. Like the text from col. 5, this portion of Casson only describes the fabrication and interconnection of a multiple layer circuit board. This portion describes the advantages of such devices in a general sense only, and in no way describes or suggests anything to do with the individual formation of the original circuit boards that make up the multilayer board.

Accordingly, this portion of text is also irrelevant to the features of the present invention discussed herein.

The Examiner's final assertion that "Casson teaches divided boards in at least Figure 1c" is simply incorrect. Fig. 1c does not show any divided boards at all. In fact, Fig. 1c is only a cross-sectional view of the one *single* board shown in Figs. 1A and 1B. The "divisions" between the "separate boards" implied by the Examiner, are not divisions at all, but instead only sectional views of the holes 25, 30, and 35 that are shown obliquely in Figs. 1A and 1B. This clear misinterpretation of the cited figure from Casson warrants immediate withdrawal of the Section 103 rejection based at least in part on Casson.

Additionally, Applicants also wish to point out that Casson is drawn to the classic "wire pattern and solder hole" circuit board, and therefore inapplicable to modern matrix patterned liquid crystal display devices. Applicants submit that there could be no motivation or suggestion to combine such a different device, as shown in Casson, with a liquid crystal display device such as that shown in the Ueda reference. The Examiner has

failed to provide any objective evidence supporting how two such different types of devices could even be combined to reach the Examiner's proposed combination.

On page 4 of Paper No. 10, the Examiner provides his only other assertion that the divided boards of the present invention are somehow taught in the cited prior art of record. Specifically, the Examiner asserts that Ueda shows divided boards at Fig. 22, and col. 19, lines 20-26. This assertion, however, is also incorrect. Although Fig. 22 (and its accompanying description in col. 19) does show two separate boards FPC1 for the gate driver and FPC2 for the drain driver, nowhere does Ueda teach or suggest that such boards (FPC1 and FPC2) are formed of the same material and/or process, and then divided. Fig. 22 of Ueda shows only that the two boards are separate *before* being connected as shown.

In contrast, Applicants respectfully remind the Examiner that claim 1 of the present invention does not merely recite that the first and third board are separate, but also that they are divided from one another after being formed of the same material and in the same process. Applicants submit that the comparison of the present invention to Fig. 22 of Ueda for teaching "divided" boards illustrates the Examiner's failure to consider the recited divided feature of the first and third board apart from the separate feature of the first and third board that is also recited. Applicants acknowledge that Fig. 22 of Ueda shows two boards separate from one another, but not that the two boards are divided from one another after being formed together.

Applicants respectfully direct the Examiner's attention to Fig. 4 of the present Application, and its accompanying description on page 6. Fig. 4 of the present Application

illustrates one clear example of two boards 1 and 12 being formed together in the same process and of the same materials on a single glass substrate 13, and then divided at severing lines 17. Applicants submit that the patentably distinct features of this example are all clearly recited in claim 1 of the present invention, and that neither of the cited prior art references, alone or together, shows any configuration even remotely similar to that shown in Fig. 4 of the present Application. For all of the foregoing reasons therefore, the Section 103 rejection based on the combination of Ueda with Casson is respectfully traversed, and should be withdrawn.

With respect to the Examiner's remarks in response to Applicants' previous discussion with respect to the objectives of the Ueda reference, Applicants submit that the Examiner appears to have confused a challenge to his original *prima facie* case of obviousness, with the rebuttal to such a potential *prima facie* case. Although Applicants submit that the Examiner has not established a *prima facie* case of obviousness against the present invention, the discussion of objectives and motivations in the prior art are relevant to a rebuttal of such a *prima facie* case, in the event that one could be established. Applicants therefore submit that a *prima facie* case has not been established and that, even if one could be established, it has been sufficiently rebutted.

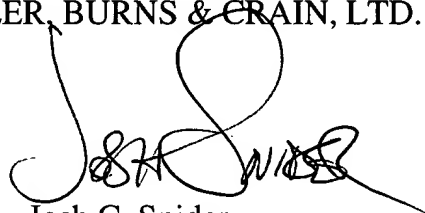
Claim 1 of the present invention has been amended only for grammatical purposes, and not in relation to the further rejection of the claims. Because such amendments are merely formal in nature, Applicants submit that they are appropriate for entry after final rejection.

For all of the foregoing reasons, Applicants submit that this Application, including claims 1 and 3-5, is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

GREER, BURNS & CRAIN, LTD.

By

A handwritten signature in black ink, appearing to read "Josh C. Snider", is written over the printed name and registration number.

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